

<b>Respondent Names</b>
Washington State Republican Party
<b>Complainant Name</b>
George Robison
<b>Complaint Description</b>
<p>Georgerobison</p> <p>Sat, 13 Jul 2024 at 11:45 PM</p> <p>See the attached file.</p>
<b>What impact does the alleged violation(s) have on the public?</b>
It allows a candidate to deceive the public and gives the candidate an unfair advantage in such things as advertising and mailings. It tends to show party support beyond what may really exist.
<b>List of attached evidence or contact information where evidence may be found</b>
Description of violation.
<b>List of potential witnesses with contact information to reach them</b>
None. Complaint is based solely on records filed with the PDC.
<b>Certification (Complainant)</b>
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Conclusions, based on a pattern, leads me to believe that Jesse Young, candidate for State Representative in Legislative District 26, has violated RCW 42.17A.405 by accepting a total of \$22,400 from a single contributor, in excess of the \$1,200 per person per election limit. This violation was aided by the Washington State Republican Party, which accepted what appears to be an earmarked contribution from Mr. Parker and gave that contribution to Jesse Young's campaign. On March 24, 2024, Gary Parker contributed \$2,400 to Jesse Young's 2024 State Representative campaign. RCW 42.17A.405(2); WAC 390-05-400.

Despite having already made the maximum contribution to the Young Campaign, on April 24, 2024, Gary Parker made a contribution of \$20,000 to the Washington State Republican Party non-exempt account. That very same day, WSRP made an expenditure for \$20,000 from the non-exempt account to the Young Campaign. Also on that day, the Young Campaign reported receiving a \$20,000 contribution from WSRP. On information and belief, Mr. Parker's \$20,000 contribution to WSRP appears to have been "earmarked" for the Young Campaign—that is, there appears to have been an instruction or understanding between WSRP and Mr. Parker that WSRP would promptly forward the \$20,000 contribution to the Young Campaign. It doesn't seem to be relevant whether this designation was "expressed or implied, or oral or written." RCW 42.17A.460. The arrangement is the intended result and from the PDC reports filed by WSRP and the Young Campaign themselves, it resulted—"in all . . . of a contribution being made to a certain candidate." Despite this, WSRP failed to file a Special Report E as required for earmarked contributions. See RCW 42.17A.270; WAC 390-16-033. Far more disturbingly, however, this arrangement has allowed Mr. Parker to make an excess contribution, and allowed the Young Campaign to receive a contribution in excess of the \$1,200 per election limit allowable by law. See RCW 42.17A.460 (treating "contributions that are in any way earmarked or otherwise directed through an intermediary or conduit to [a] candidate" the same as "contributions from that person or entity to the candidate").

1 See <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110209653>.

2 See <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110213646>.

3 See <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110213651>.

4 See <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110212210>

I am informed and believe and therefore allege the foregoing to be true and correct under penalty of perjury under the laws of Washington State.

George C. Robison